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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Received & Inspected

FEB 23 2009

FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2008

Date filed: January 31, 2009

Name of company(s) covered by this certification: Planet Telesis Inc.

Form 499 Filer ID: 826476

Name of signatory: Sirus Zolfonoon

Title of signatory: COO

I, Sirus Zolfonoon, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. Attached you will find the Planet Telesis Privacy Policy and CPNI rules adhered to by Planet Telesis, its employees, and agents.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI. Planet Telesis is not aware of any data brokers who have accessed customer CPNI information.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



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Planet Telesis Privacy Policy

Detailed below are the guidelines that comprise the Planet Telesis privacy policy (the "Policy"). The Policy applies to both Planet Telesis and Planet Online customers, including telephone calls originated in the United States and visits to or transactions with Planet Telesis websites such as www.PlanetOnline.com. International transactions are protected under applicable laws in each country where the customer initiates the transaction.

1. Planet Telesis and Planet Online create, obtain, and use customer personal information to provide products and services to its customers.
2. Planet Telesis will not disclose Customer Proprietary Network Information (CPNI) and any non-public personal information without customer consent or direction, except to business partners involved in providing Planet Telesis service to customers, or as required by law.
3. When Planet Telesis discloses CPNI or other non-public information to business partners, the Planet Telesis contract with the business partner will protect customers from others using CPNI outside of the context necessary to provide the Planet Telesis service.
4. Planet Telesis requires all associates to adhere to a code of conduct, making them responsible for ensuring the privacy our customers is sustained.
5. At times, system problems may create the need to review account information. In the event that such a problem might occur, Planet Telesis reserves the right to access a customer's account, account information or monitor a group of accounts in order to resolve the underlying problem.

In the context of the Policy,

- Personal information comprises information directly associated with a person (e.g. name, address, telephone number, and e-mail address).
- Non-public personal information is the subset of personal information that is not publicly available (e.g. credit card number, social security number, and bank account information).
- Publicly available personal information is information that is typically available from government records or websites (e.g. name, address, telephone number, and e-mail address).

CUSTOMER PROPRIETARY NETWORK INFORMATION

The Federal Communications Commission ("FCC") has established strict regulations to ensure the safety of customer information. These rules set out clear methods that telecommunications service providers must use when handling Customer Proprietary Network Information ("CPNI"). Under state and federal law, customers have a right and Planet Telesis has a duty to protect the confidentiality of Customer Proprietary Network Information ("CPNI"). Planet Telesis will not use or disclose a customer's CPNI except as permitted or required by federal statute (47 U.S.C. § 222) and applicable FCC regulations (47 CFR §§ 64.2001 - 64.2009). Planet Telesis and Planet Online must assure that customer information is used solely for the purpose of the Planet Telesis customer relationship.

CPNI is information Planet Telesis obtains or creates when it provides telecommunications services to a customer. CPNI includes the types of services purchased, how the services are used, location and configuration of services, usage and the billing detail for those services. Customer names, service addresses or telephone numbers are not considered to be CPNI, since they can be found in public documents such as telephone directories or on the internet.

Planet Telesis does not disclose CPNI outside of Planet Telesis or its authorized agents without customer consent, except as required by law. When Planet Telesis uses agents, contractors, or other companies to perform services on its behalf, Planet Telesis requires that they protect CPNI or other sensitive personal information consistent with the FCC guidelines and the Policy.

As a Planet Telesis customer, you have the right to impose additional restrictions on Planet Telesis' use of your CPNI by "opting out." If you opt out, Planet Telesis may not use your CPNI to market additional services to you. In order to opt out, please notify Planet Telesis in writing at 20501 Ventura Blvd, Woodland Hills, CA 91364 Attn: Customer Service. Please include Customer name, billing address, telephone number including area code, and account number in the letter.

Disclosures

Planet Telesis may disclose personal information to the following entities.

Vendors

Planet Telesis may need to provide personal information to a third party vendor in order to complete the transaction you have requested or to perform a service on your behalf. The vendor is only allowed to use this information when it acts solely on our behalf. Planet Telesis does not allow it to use your information for any other purpose.

Third Party

Customers may take advantage of services and products offered by other companies through our services. In those instances, customers will provide personal information to those companies directly. Information received by those third parties will be governed by their privacy policies, not the Planet Telesis Policy.

Contests and Promotions

Customers may participate in contests, giveaways, or other promotions sponsored by Planet Telesis or Planet Online. Participation may require sharing your personal information with a sponsor of the contest, giveaway, or promotion. Please check the specific rules to determine how your information will be used and shared with others. Some states also require that contest winners be disclosed to a state agency.

Business Transfers

Information about our users, including personal information, may be disclosed as part of any merger, acquisition, sale of company assets, or transaction of service to another provider, as well as in the unlikely event of insolvency, bankruptcy, or receivership in which personal information would be transferred as one of the business assets of the company.

Protection of Planet Telesis & Planet Online and Others

Planet Telesis and Planet Online will disclose personal information when we believe release is permitted or required by law.

These situations include:

- implementing customer agreements,
- billing and collection,
- protecting ourselves and other service providers from fraud or abuse,
- ensuring accurate tax/fee/government subsidy calculations, or
- responding to emergencies that we believe may result in personal injury or death.

Security

Planet Telesis and Planet Online assume no liability and make no guarantee, either expressed or implied, for the security of any data on any of its servers. Planet Telesis and Planet Online customers are responsible for maintaining the basic security of their systems to prevent abuse by others in a manner that complements this Policy. Customers should ensure that they can properly secure a mail server so that it may not be used to distribute "spam." In addition, customers should ensure that they can secure an FTP server so that it cannot illegally distribute licensed software.

Planet Telesis and Planet Online services and associated network may not be used in connection with prohibited activities, include hacking, cracking into, monitoring, distributing viruses/worms/other harmful software, or any other activity that uses services without permission.

Cooperation with Law Enforcement

Planet Telesis and Planet Online will cooperate with the appropriate legal authorities while these authorities investigate illegal activity and/or other investigations, including court orders, subpoenas, fraud detection, intellectual property infringement, and any other activity that exposes Planet Telesis and Planet Online to legal liability.

Intellectual Property Theft

Customers understand that it is illegal to copy, upload to a website, email, or blog any information that is covered by copyright, trademark, patent, trade secret, or other proprietary designation.

Unintentional Harm

Planet Telesis and Planet Online disclaim any liability for harm to third parties as a result of insufficient security on customer networks or systems. As detailed above, it is recommended that all customers utilize internet and server security software so that it may not only protect itself but also protect others from unintentional harm.

In the event that a customer's network has been compromised by illegal activity including spam, Planet Telesis and Planet Online may temporarily suspend use of an Internet connection until the fraud can be stopped. Planet Telesis and Planet Online will do its best to provide customers with notification prior to suspension, but may not be able to in certain circumstances.

Limitation of Liability for Data Security

Although Planet Telesis and Planet Online utilize internet security, we cannot guarantee that your personal identifiable information or private communications will always remain private.

Retention of Information

Planet Telesis retains all information it collects under this Policy as long as there is a business need for it. In addition, we have implemented a record keeping policy that is required by service providers under state and federal law.

Abuse

Planet Telesis and Planet Online prohibit the unauthorized use of any Planet Telesis or Planet Online server, commonly referred to as "hacking." This prohibition includes the use of viruses, worms, or any other illegal intrusion activity. When we or another party identifies this type of activity, we may notify law enforcement and also terminate service.

Illegal Activity

Planet Telesis and Planet Online services may not be used in connection with any illegal activity, including intellectual property theft or other crime, as well as any civil violation that would be considered illegal in any applicable jurisdiction.

Fraud

Planet Telesis and Planet Online customers are prohibited from using services purchased to engage in deceptive online marketing practices including, but not limited to, violating the United States Federal Trade Commission's online marketing guidelines.

Impermissible Storage

The storage of any program for use in hacking, spamming, cramming, creating of viruses/worms, or IRC bots is prohibited on Planet Telesis or Planet Online servers.

Email

Planet Telesis and Planet Online prohibit the sending of unsolicited commercial email ("UCE"), also commonly referred to as "spam". Using any service for advertising, promoting, sending, or receiving responses to UCE is prohibited. UCE can include any of the following:

- Sending any unsolicited email, uploading messages, or posting to a website that could be viewed by Planet Telesis or Planet Online to provoke complaints, request money, request signatures, collect responses, or threaten others. Emails of this nature with an "opt-out" link still qualify as UCE.
- Sending large volume of unsolicited email or posting to online forums or groups (more than 50 identical or substantially similar messages) at one time without prior written authorization.
- Sending ghost emails that do not accurately identify the sender, return address, and the sender's email address.

Internet Relay Chat (IRC)

Planet Telesis and Planet Online reserve the right to take any remedial action required, including account termination, if a customer's activities result from an IRC server or servers.